

Paul J. Riehle (SBN 115199)
paul.riehle@faegredrinker.com
FAEGRE DRINKER BIDDLE & REATH LLP
Four Embarcadero Center, 27th Floor
San Francisco, CA 94111
Telephone: (415) 591-7500

Glenn D. Pomerantz (SBN 112503)
glenn.pomerantz@mto.com
MUNGER, TOLLES & OLSON LLP
350 South Grand Avenue, Fiftieth Floor
Los Angeles, California 90071
Telephone: (213) 683-9100

Christine A. Varney (*pro hac vice*)
cvarney@cravath.com
CRAVATH, SWAINE & MOORE LLP
825 Eighth Avenue
New York, New York 10019
Telephone: (212) 474-1000

Brian C. Rocca (SBN 221576)
brian.rocca@morganlewis.com
MORGAN, LEWIS & BOCKIUS LLP
One Market, Spear Street Tower
San Francisco, CA 94105-1596
Telephone: (415) 442-1000

Counsel for Plaintiff Epic Games, Inc.

Counsel for Defendants Google LLC et al.

[Additional counsel appear on signature page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**IN RE GOOGLE PLAY STORE
ANTITRUST LITIGATION**

THIS DOCUMENT RELATES TO:

Epic Games, Inc. v. Google LLC et al.,
Case No. 3:20-cv-05671-JD

Case No. 3:21-md-02981-JD

**PARTIES' JOINT ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED PURSUANT TO
CIVIL LOCAL RULE 79-5**

Judge: Hon. James Donato
Trial Date: November 6, 2023
Time: 9:00 am
Place: Courtroom 11, 19th Floor

Pursuant to Civil Local Rules 7-11 and 79-5(f), Plaintiff Epic Games, Inc. and Defendants Google LLC, Google Ireland Limited, Google Commerce Ltd., Google Asia Pacific Pte. Ltd. and Google Payment Corp. (collectively, the “Parties”) submit this joint administrative motion to consider whether other parties’ materials should be sealed with respect to the Parties’ filing of the exhibits admitted during trial, pursuant to Civil Local Rule 5-1(g). The documents and portions of documents the Parties seek to provisionally file under seal are listed below:

Party	Exhibit No.	Pages
Amazon ¹	1362	-001 (all text below the gray row except for cell B4) -002 (all text in the chart except for cell C14) -003 (all text in the chart except for cell D21)
	1363	-Summary_1 (entire tab) -Summary_2 (entire tab) -Summary_3 (entire tab)
	1366	-002 (all text except for Q&A 3) -003-15 (entire pages) -017-18 (entire pages)
	11406	-003-07 (entire pages)
Apple ²	1492	-002 (under “(a) Safari (Web Browser Software), in second paragraph from “Web Browser Software” to end of sentence) -002 (definition of term following “Default”) -008 (information in the paragraph continued from previous (not excerpted) page) -008 (information in the paragraph following “Annual CEO-Check-In”) -008 (information under “6. Limitation of Liability”);)
	1493	-005 (information in row 1 of the Relationship Map related to “Ads (GCAS)”) -005 (information in row 2 of the Relationship Map related to “Ads (GMP)”) -005 (information in row 5 of the Relationship Map related to “Corp Eng”) -005 (information in row 6 of the Relationship Map related to “Cloud”)
Nintendo	1524	-007 (graphic on the bottom right) -016 (entire first row of the table on the left) -027 (entire eleventh row) -028 (entire third bullet under “Cloud Deals”) -030 (right two cells of the tenth row)

¹ Amazon’s motion to seal has been granted. *See* Dkt. 884.

² Apple’s motion to seal has been granted only to the extent the portions requested for sealing were not shown in open court. *See* Dkt. 884.

Party	Exhibit No.	Pages
		-035 (entire fifth line of speaker notes) -037 (entire third bullet; entire third sub bullet) -038 (second through eighth words and tenth through twelfth words of third bullet on the leftmost column) -041 (entire sixth row)
	384 ³	-011 (entire fourth bullet of speaker notes) -014 (entire eleventh row of table) -015 (entire eleventh row of table) -019 (first, third and sixth columns of the fourth row of table) -025 (first word in footnote 1 and fourth word in footnote 1 through the end of footnote 1) -042 (entire fifth bullet of speaker notes) -043 (entire third bullet) -044 (entire fourth row of chart) -052 (in the last two lines in the bottom left box: the first through third words, and the sixth word through the end) -058 (first and last columns of the fourth row of table)
Riot	11221	-Entire exhibit
	11222	-Entire exhibit
	11226	-Entire exhibit
	11227	-Entire exhibit
	11229	-Entire exhibit
Sony	7089	-Entire ninth row
	7090	-Entire eleventh row
TikTok Inc. ⁴	2698	-052 (entire page)
Warner Bros. Discovery, Inc. ⁵	1704	-014 (entire fifth bullet point that references HBO under the column “[Status] Asks”) -016 (entire fifth bullet point that references HBO under the column “[Status] Asks”) -019 (entire bullet point that references HBO Now Subscribers)
	2698	-052 (entire subheading that references WarnerMedia and the green bar in the graph that references WarnerMedia revenue)
	5674	-016 (entire blue bar in the graph that references HBO Now average subscription information)

³ In addition, pursuant to the Court’s guidance during trial, *see* Trial Tr. at 331:13-338:4, the Parties have redacted portions of pages 22 and 25 of Exhibit 384.

⁴ TikTok’s motion to seal has been granted. *See* Dkt. 884.

⁵ Warner Bros.’ motion to seal has been granted. *See* Dkt. 884.

1 The Parties hereby provide notice of lodging to all parties and their counsel pursuant to
2 Civil Local Rule 79-5(f).

3
4 DATED: December 21, 2023

CRAVATH, SWAINE & MOORE LLP

Christine Varney (*pro hac vice*)

cvarney@cravath.com

Gary A. Bornstein (*pro hac vice*)

gbornstein@cravath.com

Timothy G. Cameron (*pro hac vice*)

tcameron@cravath.com

Yonatan Even (*pro hac vice*)

yeven@cravath.com

Lauren A. Moskowitz (*pro hac vice*)

lmoskowitz@cravath.com

Justin C. Clarke (*pro hac vice*)

jcclarke@cravath.com

Michael J. Zaken (*pro hac vice*)

mzaken@cravath.com

M. Brent Byars (*pro hac vice*)

mbyars@cravath.com

FAEGRE DRINKER BIDDLE & REATH LLP

Paul J. Riehle (SBN 115199)

Respectfully submitted,

By: /s/ Gary A. Bornstein

Gary A. Bornstein

17 DATED: December 21, 2023

MORGAN, LEWIS & BOCKIUS LLP

Brian C. Rocca

Sujal J. Shah

Minna L. Naranjo

Rishi P. Satia

Michelle Park Chiu

Respectfully submitted,

By: /s/ Brian C. Rocca

Brian C. Rocca

1 DATED: December 21, 2023

MUNGER, TOLLES & OLSON LLP

2 Glenn D. Pomerantz

3 Kyle W. Mach

4 Kuruvilla Olasa

5 Justin P. Raphael

6 Emily C. Curran-Huberty

7 Jonathan I. Kravis

8 Respectfully submitted,

9 By: /s/ Glenn D. Pomerantz

10 Glenn D. Pomerantz

11 *Counsel for Defendants Google LLC et al.*

E-FILING ATTESTATION

I, Gary A. Bornstein, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

/s/ Gary A. Bornstein
Gary A. Bornstein